

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

UNITED STATES OF AMERICA,

v.

**THOMAS H. SACHY,
MAUREEN SACHY,
EVELYNE ENNIS, and
BRANDY LYNN HAMILTON, a.k.a.
BRANDY LYNN BIRCHFIELD**

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CRIM. NO: 5:18-CR-48 (TES)

**SECOND NOTICE OF BILL OF PARTICULARS
FOR FORFEITURE OF PROPERTY**

COMES NOW, the United States of America, by and through the United States Attorney for the Middle District of Georgia, and files this Second Notice of Bill of Particulars for Forfeiture of Property.

The first Notice of Bill of Particulars for Forfeiture of Property [Doc. 80] for the above-styled case included a forfeiture provision which notified the above-named Defendants that upon conviction of any of the offense(s) contained in Counts One through Six of the Indictment, including Title 21, United States Code, Section 846, i/c/w Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(2) set forth in Count One; Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(2) set forth in Count Two; Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) set forth in Counts Three and Four; Title 21, United States Code, Sections 856(a)(1) and 2 set forth in Count Five; and/or Title 18, United States Code, Section 1956(h), i/c/w Title 18, United States Code, Section 1956(a)(1)(A)(i) set forth in Count Six of the Indictment that the Defendants shall forfeit to the United States of America pursuant to Title 21,

United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly and indirectly, as a result of such offense(s), and any property, real or personal, used, or intended to be used in any manner or part to commit, or to facilitate the commission of, the offense(s); and/or any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1), including, but not limited to the following: real property currently listed in the names of Franklin J. Hogue and Laura D. Hogue, formerly in the name of Sachy, LLC, a Georgia Limited Liability Company, and previously in the name of Thomas H. Sachy, known as 247 Lana Drive, Gray, Jones County, Georgia, and any appurtenances and improvements thereon.

NOTICE IS HEREBY GIVEN to Defendants Thomas H. Sachy, Maureen Sachy, Evelyne Ennis, and Brandy Lynn Hamilton, a.k.a. Brandy Lynn Birchfield, that upon conviction, the Government will seek criminal forfeiture pursuant to the Forfeiture Notice set forth below:

FORFEITURE NOTICE
(21 U.S.C. § 853 and 18 U.S.C. § 982 - Criminal Forfeiture)

1. The allegations contained in Counts One through Six of this Indictment are hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeiture to the United States of America, pursuant to the provisions of Title 21, United States Code, Section 853, and/or Title 18, United States Code, Section 982(a)(1).

2. Upon conviction of any of the offense(s) contained in Counts One through Six of this Indictment, including Title 21, United States Code, Section 846, i/c/w Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(2) set forth in Count

One; Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(2) set forth in Count Two; Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) set forth in Counts Three and Four; Title 21, United States Code, Sections 856(a)(1) and 2 set forth in Count Five; and/or Title 18, United States Code, Section 1956(h), i/c/w Title 18, United States Code, Section 1956(a)(1)(A)(i) set forth in Count Six of the Indictment the defendants,

**THOMAS H. SACHY,
a physician authorized to prescribe controlled substances,
MAUREEN SACHY,
EVELYNE ENNIS, and
BRANDY LYNN HAMILTON, a.k.a. BRANDY LYNN BIRCHFIELD,**

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly and indirectly, as a result of such offense(s), and any property, real or personal, used, or intended to be used in any manner or part to commit, or to facilitate the commission of, the offense(s); and/or any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1), including, but not limited to the following:

REAL PROPERTY

A. Real property known as 247 Lana Drive, Gray, Jones County, Georgia, and any appurtenances and improvements thereon, which is more particularly described as:

All that tract or parcel of land lying and being in Land Lot 30 of the 9th Land District of Jones County, Georgia, and being more particularly designated as Lot 7, containing 1.57 acres, more or less, according to a survey prepared by Herbert B. Orr, G.R.L.S., dated March 1, 2001, which appears of record in Plat Book 16, Page 220, Clerk's Office of Jones County

Superior Court, to which reference is made for a more complete and accurate description.

Said property is transferred subject to all easements and restrictions of record.

This is the same property described in a Quit Claim Deed dated February 12, 2009 and recorded in Deed Book 771, Page 423; aforesaid records.

Under the present system of numbering, this property is known as 247 Lana Drive, Gray, Jones County, Georgia.

Tax Map Parcel No.: J38 00 318A

FIREARMS

- A. Six (6) assorted firearms with magazines and ammunition, seized from Thomas Sachy at Georgia Pain and Behavioral Medicine, more particularly described as follows:
1. One (1) Berretta, Model: U22 Neos, .22 caliber pistol, Serial Number: R12360, with attached magazine and four (4) rounds of ammunition;
 2. One (1) Ruger, Model: 10/22, .22 caliber Takedown Lite rifle, Serial Number: 354-28585, with attached magazine and fourteen (14) rounds of ammunition;
 3. One (1) Remington, Model: 870, .12 caliber Express Synthetic Tactical shotgun, Serial Number: AB879440M, with seven (7) rounds of ammunition;
 4. One (1) Lithgow Enfield, Model: S.M.L.E, .303 caliber MK III rifle, Serial Number: 95157, with attached magazine;

5. One (1) Taurus, Model: PT-145, .45 caliber Millennium Pro pistol, Serial Number: NCS95614, with attached magazine and nine (9) rounds of ammunition;
 6. One (1) Smith & Wesson, Model: 4516, .45 caliber Compact Stainless pistol, Serial Number: TCT0969, with attached magazine and eight (8) rounds of ammunition.
- B. One (1) Smith & Wesson, Model: 317 Air Lite, .22 caliber revolver, Serial Number: CBZ5953, seized from Evelyne Ennis at Georgia Pain and Behavioral Medicine.

BANK/RETIREMENT ACCOUNTS

- A. Two hundred five thousand, eight hundred eighty-four dollars and twenty-nine cents (\$205,884.29), seized from State Bank and Trust Company, Money Market Account Number: 2000235552; believed to be held by Thomas and Maureen Sachy;
- B. Fifty thousand, seven hundred twenty-five dollars (\$50,725.23), seized from Robins Financial Credit Union, Checking Account Number: 1000438817704, Member Number 70, believed to be held by Sachy, LLC;
- C. One hundred twenty-nine thousand, nine hundred twenty-six dollars and eighty cents (\$129,926.80), seized from Robins Financial Credit Union, Business Account Number: 1000368877779, Member Number 77; believed to be held by Georgia Pain and Behavioral Medicine;

- D. Fifty thousand, nine hundred forty-nine dollars and fifty-four cents (\$50,949.54), seized from Robins Financial Credit Union, Checking Account Number: 1000489414707; believed to be held by Maureen Sachy;
- E. Eight hundred sixty-two thousand, three hundred seventy-two dollars, and four cents (\$862,372.04), seized from Vanguard, SEP IRA Account Number: 46436568, believed to be held by THS Family Limited Partnership;
- F. Fifty-two thousand, one hundred sixty-two dollars, and sixteen cents (\$52,162.16), seized from Vanguard, SEP-IRA Account Number: 0540-88112241999, believed to be held by Thomas Sachy;
- G. Thirty-six thousand, eight hundred ninety-five dollars, and seven cents (\$36,895.07), seized from Vanguard, 500 Index Fund IRA Account Number: 054-88114516091, believed to be held by Thomas Sachy; and
- H. Sixty-five thousand, seventy-six dollars, and fourteen cents (\$65,076.14), seized from Vanguard, Individual Account Number: 43090798, believed to be held by Thomas Sachy.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon exercise of due diligence;
- (b) has been transferred, sold to or deposited with, a third person;

- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and as incorporated by 18, United States Code, Section 982(b)(1).

All pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982.

Respectfully submitted this 3rd day of December, 2018.

CHARLES E. PEELER
UNITED STATES ATTORNEY

By: s/ JIM CRANE
ASSISTANT UNITED STATES ATTORNEY
GEORGIA STATE BAR NO. 193275
UNITED STATES ATTORNEY'S OFFICE
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CERTIFICATE OF SERVICE

I, JIM CRANE, Assistant United States Attorney, do hereby certify that on this date, I electronically filed the within and foregoing **Second Notice of Bill of Particulars for Forfeiture of Property** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all record of counsel.

DATED, this 3rd day of December, 2018.

CHARLES E. PEELER
UNITED STATES ATTORNEY

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